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West Michigan Environmental Action Council
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Translating concern
into action

October 20, 1978

Dr. Howard Tanner, Director
Department of Natural Resources
Executive Division, 7th Floor Mason Bldg.
P. O. Box 30028
Lansing, Michigan 48909

Dear Dr. Tanner:

The enclosed letter re: the Plainfield Township Landfill Facility in Kent County illustrates, dramatically the "voluntary compliance" type of action by the Department for which it is being so severely critized, and rightly so.

Kent County was granted a license to operate the Plainfield Facility on April 19, 1976. Included in the license were some 15 stipulations required by the Hearings Officer, the Natural Resources Commission and the Department Staff (license attached). These are serious stipulations and were considered by all parties involved to be the "rules of the game". They were not added just to pacify the environmentalists, but were the result of serious, technical considerations of a complex issue by nationally renowned experts in the field. They were added because they were necessary to protect the health and safety of area residents and the environment of the State of Michigan.

Perhaps the most critical stipulations related to the construction and separation of all underdrains, installation of monitoring wells, and the stabilization of the groundwater level at seven feet or more below the bottom of each refuse cell. All of these stipulations were to be completed "prior to any excavation or filling of refuse cells" as specified on the license.

Now 2½ years later, these critical stipulations have not yet been met. WMEAC and Plainfield Township officials have constantly pressured the Resource Recovery Division of Kent County to address these issues. We have conducted and attended meeting after meeting, have written letter after letter. Always there are promises of correction and time lines are set. Time passes . . . and deadlines expire, new ones are set and expire and the refuse continues to go to the landfill. At the same time Kent County

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officials and Department Staff speak of the model Plainfield Facility . . . "the most environmentally sound in the State." Maybe it was on paper, but the fact is that it more clearly resembles a high rise building with a fancy facade constructed on a foundation of toothpicks and bubble gum.

The Facility is now nearly filled at the critical underground level and all cell construction is nearly complete. The additional landfill life is estimated at approximately three years. Additional filling will involve piling refuse above ground.

Because the existing stipulations were violated it is now extremely difficult to correct the underground problems - exactly the reason they were to have been done before any refuse was deposited.

As the enclosed letter indicates, the Department is now ready to reissue the license with even more stipulations. Based on the Department's track record we can only assume that the new stipulations are just meaningless promises that may not ever be fulfilled.

We certainly understand all of the budget, staff, organizational problems, etc. But the bottom line is that the Department either takes a hard line on enforcement or it doesn't. If it doesn't, we must ask several basic questions:

1. How serious is the Department toward protecting public health and the environment of the State?
2. How ill the people of the State pay for the predictable later clean up costs resulting from sloppy enforcement?
3. What incentive is there for business, industry, and government to comply with environmental laws if they know there will be no hard line enforcement and they can continue to operate with a "business as usual" attitude?
4. Is it any wonder that citizens and local government officials are concerned about the location of disposal areas in their communities when the Department's track record is so visibly inadequate?
5. Why should citizens or local officials trust the Department to operate in their best interest to protect their public health and the environment of the State?

I hope we can seriously discuss these problems and others at our October 31st meeting.

Sincerely,

Jeffrey L. Dauphin

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DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

State Office Building
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October 17, 1978

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Mr. Jeff Dauphin
West Michigan Environmental
Action Council
1324 Lake Drive, S. E.
Grand Rapids, Michigan 49506

Dear Mr. Dauphin:

In response to your September 8, 1978 correspondence, I have the following comments relative to the current status of the Plainfield Township landfill.

Kent County is currently investigating the most practical method of lowering the water table in the southeast portion of the facility in order to provide the required seven feet vertical isolation. Two possibilities exist which are under consideration by the Board of Public Works: 1.) The extension of the existing dewatering system along the east side of the landfill, or 2.) The installation of a new dewatering trench along the south portion of the site. The latter of the two appears to be the most beneficial since the possibility of encountering inadequate groundwater separation in the south and south-west areas of the site exists. The installation along the south would be conducive to a westerly extension should the need arise.

The piezometric surface map requested during the July 25, 1978 meeting has been submitted to the D.N.R. by Kent County. Staff has been rechecking the static water levels over the past few weeks to determine if the map submitted reflects a stabilized condition. Once the map is finalized, a decision can be made relative to: 1.) The need for or elimination of the east-west interceptor trench to be installed south of Ten Mile Road, 2.) If adequate vertical groundwater separation exists in the south-west portion of the site, and 3.) The designation of existing wells and/or the installation of additional wells for use of groundwater monitoring purposes.

The installation of the dewatering system to service the southeast area of the site will allow the ground water under drainage devices (flexible plastic drain tile) previously installed beneath the cells to be eliminated and sealed to prevent any cross connection with the leachate collection system. After the ground water is eliminated from the leachate collection system, the storage capabilities of the leachate retention pond will be taken into consideration.



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The concerns relative to the obstructions in the leachate manhole between cell #17 and cell #2 have not been corrected due to the presence of gases. Artificial breathing equipment will have to be obtained prior to correction. The lowest perforated section of all manholes will be sealed and debris removed once this equipment is obtained.

The remainder of the items of concern were discussed and resolved during the July 25, 1978 meeting.

The D.N.R. has formulated a list of stipulations which are proposed to appear on the 1978-79 license. The stipulations are primarily based on the items discussed at the July meeting. I presume the license will be processed this week and issued the following week.

If you have any questions, feel free to contact this office.

Very truly yours,

RESOURCE RECOVERY DIVISION


Gerard Heyt,
Environmental Engineer

GH/mc

cc: Fred Kellow
Vern Ehlers, Kent County B.P.W.
Don Lamoreaux, Plainfield Twp. Supervisor